

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY FOR A CERTIFICATE OF	)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR	)	2022-00066
THE CONSTRUCTION OF TRANSMISSION	)	
FACILITIES IN HARDIN COUNTY, KENTUCKY	)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION  
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company (KU), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on May 20, 2022. The Commission directs KU to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KU shall make timely amendment to any prior response if KU obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which KU fails or refuses to furnish all or part of the requested information, KU shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, KU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to KU's response to Wade Family Farm Management, LLC's Second Request for Information (Wade Family's Second Request), Item 11, and KU's Response to Commission Staff's Third Request for Information (Staff's Third Request), Item 2. Provide any summaries, reports, or presentations produced in relation to any wetland delineation survey, geotechnical exploration, or field soil resistivity survey, or any other on-site field study KU has conducted in relation to the Glendale Megasite. Consider this an ongoing request during the pendency of this application.

2. Refer to KU's response to Wade Family's Second Request, Item 7a. Confirm that KU is prepared to commit that the proposed 345 kV transmission line will be located to not interfere with the operation of the pivot irrigation system.

3. Refer to the Application, the Direct Testimony of Beth McFarland, page 5, lines 7–10.

a. Describe all alternatives to rerouting the existing Brown North-Hardin County 345 kV line that were considered.

b. Provide any documentation or studies to support the decision to reroute the line.

c. Provide the cost-benefit analysis for the rerouting of the 345 kV line as opposed to tapping the existing 345 kV line.

d. Refer to KU's response to Staff's Third Request, Item 7. Provide where the \$1.7 million figure appears in the Application.

4. Provide a breakdown of all anticipated costs of constructing each of the proposed 138 kV transmission lines.

5. Provide a breakdown of all anticipated costs of constructing Glendale South Substation.

6. Provide a breakdown of all anticipated costs of constructing the Glendale Industrial Substation.

7. Provide a breakdown of all anticipated costs of constructing each of the 345 kV transmission lines.

8. Refer to KU's response to Wade Family's Second Request, Item 6, as well as KU's response to Staff's Second Request, Item 6 and reconcile the two responses.

9. Refer to KU's response to Browns' Second Request for Information, Items 2–5. State whether any material agreements were reached on May 3, 2022, between the parties with regard to locating the proposed transmission lines on the Browns' parcels.

10. Provide a list of all possible safety or code violations that could occur should KU build the transmission lines over the Wade Family Farms' irrigation system. Provide any studies or permits KU has performed or obtained to address the irrigation system and safety issues presented by water stream pressure.

11. Describe any contractual agreements related to fines or incentives to prevent power outages between KU and Ford. Provide copies of any executed agreements concerning commitments KU has made to Ford regarding outage prevention.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
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DATED   MAY 11 2022  

cc: Parties of Record

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